

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

IN RE: )  
 )  
CUMMINGS MANOOKIAN, PLLC, ) Case No. 3:19-bk-07235  
Debtor. ) Chapter 7  
 ) Judge Walker  
JEANNE ANN BURTON, TRUSTEE, )  
Plaintiff, )  
 )  
v. )  
 )  
HAGH LAW, PLLC; AFSOON )  
HAGH; MANOOKIAN, PLLC; and )  
FIRST-CITIZENS BANK & TRUST )  
COMPANY, )  
Defendants. ) ) Adv. Proc. No. 3:20-ap-90002

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**NOTICE OF DEPOSITION OF MARTY FITZGERALD**

Pursuant to Federal Rules of Bankruptcy Procedure 7026 and 7030 Jeanne Ann Burton, Chapter 7 Trustee and Plaintiff in this action, respectfully gives notice that she will take the deposition of Marty Fitzgerald, on May 27, 2022, beginning at 10:00 a.m. Central time via Zoom Video Conference. A link to the conference will be sent to counsel for all parties and to the witness; any other party wishing to participate in the deposition should contact undersigned counsel. The deposition will be recorded by stenographic and/or videographic means. The topics to be addressed in the deposition are any nonprivileged matters relevant to any party's claims or defenses, pursuant to Rule 26(b)(1) of the Federal Rules of Civil Procedure made applicable to this matter by Rule 7026 of the Federal Rules of Bankruptcy Procedure. The Trustee anticipates addressing the following topics:

- The representation of Mr. Fitzgerald by the Debtor and by each of the Defendants
- Mr. Fitzgerald's written and oral communications with the Debtor and each of the Defendants

Dated: May 5, 2022

Respectfully Submitted,

/s/ Phillip G. Young, Jr.\_\_\_\_\_

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Special Counsel for Jeanne Ann Burton,  
Trustee

**Certificate of Service**

The undersigned hereby certifies that a true and exact copy of the foregoing has been served via electronic notice/ECF on all parties having made an appearance herein.

This 5<sup>th</sup> day of May, 2022.

/s/ Phillip G. Young, Jr.\_\_\_\_\_

Phillip G. Young, Jr.